

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION**

HEATHER JEFFERSON, )  
                          )  
                          )  
Plaintiff,            )  
                          )  
                          )  
v.                     )   No. 1:10-cv-153 SNLJ  
                          )  
                          )  
CITY OF KENNETT, MISSOURI, ET AL., )  
                          )  
                          )  
Defendants.            )

**JOINT PROPOSED SCHEDULING PLAN**

COME NOW the parties, by and through their attorneys, and respectfully submit a Joint Proposed Scheduling Plan pursuant to this Court's Order of March 10, 2011 (Doc. # 31):

- I.       Scheduling Plan:
  1.       This case has been appropriately assigned to Track 2 (Standard).
  2.       All motions for joinder of additional parties or amendment of the pleadings should be filed no later than July 8, 2011.
  3.       Discovery shall proceed in the following manner:
    - (a)      The parties shall make all disclosures required by Rule 26(a)(1), Fed.R.Civ.P., no later than May 6, 2011.
    - (b)      Expert witness discovery shall proceed as follows:
      1.       Any party that plans to use an expert testimony shall disclose the expert witness(es) and shall provide the reports required by Rule 26(a)(2), Fed.R.Civ.P., no later than August 19, 2011 and shall make expert witnesses

expected to testify at trial available for depositions no later than September 16, 2011.

2. If a party does designate an expert witness, then the other party may disclose an expert witness with respect to the same topic and provide the reports required by Rule 26(a)(2) no later than September 23, 2011. Any such expert witness expected to testify at trial shall be made available for depositions no later than October 21, 2011.
3. Any rebuttal experts shall be disclosed and the reports required by Rule 26(a)(2), Fed.R.Civ.P., provided no later than October 28, 2011. Rebuttal experts shall be made available for depositions no later than November 18, 2011.

(c) The presumptive limit of twenty-five interrogatories per party as set forth in Rule 33(a), Fed.R.Civ.P., shall apply.

The presumptive limit of ten depositions per side as set forth in Rule 30(a)(2)(A), Fed.R.Civ.P., shall apply.

(d) Any motions requesting physical or mental examinations of parties pursuant to Rule 35, Fed.R.Civ.P., shall be filed no later than May 20, 2011.

(e) The parties shall complete all discovery in this case no later than December 9, 2011.

4. The parties believe that referral of this action to Alternative Dispute Resolution would be most productive on July 1, 2011.
5. Any dispositive must be filed no later than January 6, 2012. Any response shall be filed within twenty-eight days. Any reply shall be filed within fourteen days.

II. Trial

The parties submit that this case will be ready for a jury trial on or after June 4, 2012. It is anticipated that the length of time to try the case to verdict is approximately five days.

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& BORBONUS, LLC

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